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FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING
2020 JAN 15 PM 2:54
MARGARET BOTKINS, CLERK
CHEYENNE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 20-cr-23-5

TODD DENNIS HARRIS,

Defendant.

MOTION FOR DETENTION HEARING

The United States moves for pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

10+ year drug offense
Serious risk Defendant will flee

2. Reason for Detention. The court should detain the Defendant because there are no conditions of release which will reasonably assure:

Defendant's appearance as required

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against the Defendant under § 3142(e). The presumption applies because:

Probable cause to believe Defendant committed 10+ year drug offense

4. Time for Detention Hearing. The United States requests the Court conduct the detention hearing:

After a continuance of three days

DATED this 15th day of January, 2020.

MARK A. KLAASSEN
United States Attorney

By: Stephanie Hambrick
STEPHANIE A. HAMBRICK
Assistant United States Attorney